

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

V.

ROSS HACK, and LELAND JONES,

## Defendants.

2:12-CR-00063-PMP-CWH

## ORDER

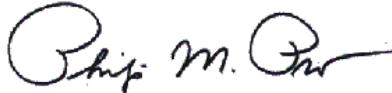
The Court has reviewed the proposed juror questionnaire submitted jointly by the parties, and discussed at the hearing conducted July 7, 2014 (Doc. #287). The Court has made revisions to the questionnaire it deems appropriate, and the approved juror questionnaire is attached to this Order. The attached questionnaire will be completed by a sufficient number of prospective jurors summonsed by the Court's jury administrator, and one copy per party of the completed questionnaires will be made available to counsel not later than 11:00 a.m. on Friday, August 15, 2014. This will enable counsel to review the prospective juror responses and discuss them with co-counsel and opposing counsel to assist them in reaching agreement as to whether particular jurors should be excused, or if they cannot so agree, to formulate their objections to any particular prospective juror. Counsel are reminded that no contact shall be made, directly or indirectly, with any prospective juror on behalf of any party to this case prior to jury selection on August 19, 2014.

1                   The Court will convene with counsel for a further pre-trial conference on  
2 Monday, August 18, 2014, at 8:30 a.m., in Courtroom 7C, at which the Court will consider  
3 counsel's proposals, jointly or individually, as to which prospective jurors should be  
4 excused based upon their responses on the juror questionnaires. At this hearing, counsel  
5 shall also submit to the Court such further voir dire questions which counsel thinks should  
6 be propounded to any or all prospective jurors at jury selection the following day.  
7 Prospective jurors will not be present for this hearing on August 18. However, those  
8 prospective jurors who are not excused will be present for jury selection on Tuesday  
9 morning, August 19, at 8:30 a.m., following which trial will proceed before the jury  
10 selected.

11                   Counsel are further advised that all trial proceedings in this case will occur in  
12 Courtroom 7C.

13                   **IT IS SO ORDERED.**

14  
15 DATED: July 30th, 2014

  
16 PHILIP M. PRO  
17 United States District Judge

18  
19  
20  
21  
22  
23  
24  
25  
26

## QUESTIONNAIRE FOR PROSPECTIVE JURORS

### United States v. Ross Hack and Leland Jones

**2:12-CR-0063-PMP-CWH**

The questions on this form are asked to help the Court and the lawyers learn something about your background and views on issues that may be relevant to your service as a juror in this case. The questions are not meant to invade your privacy, but to help select an impartial jury for this case. Please read each question carefully, and answer each question as fully as you can. If a question does not apply to you, write N/A (Not Applicable), rather than leave the question blank.

If you do not understand a question, need more space for your response or wish to make further comments about any question, please use the extra sheet attached to the back of the questionnaire. If you wish to discuss your response to any question with the Court and the attorneys during jury selection, please indicate you wish to do so next to that question. Do not discuss this case or questionnaire with anyone including your fellow jurors, and do not discuss this questionnaire or this case on any form of social media, including Facebook, Twitter, etc.

The case for which you are being questioned is United States v. Ross Hack and Leland Jones. Both Defendants are charged with the Murder of Daniel Shersty and Lin Newborn on July 4, 1998. The trial will commence with jury selection on Tuesday, August 19, 2014, at 8:30 a.m. It is estimated that trial will take approximately three to four weeks to complete.

The answers you provide on this questionnaire will be reviewed only by the judge, court personnel, the lawyers in the case and their staff. Neither your identity nor your answers will be released to the general public or the media, though you may be questioned about individual answers during the jury selection process. Your answers to this questionnaire are part of the jury selection process and will become part of the records of this court. Your answers must be truthful under the penalty of perjury.

**Please do not write on the back of any page of this questionnaire. Please do not discuss your responses to this Questionnaire with anyone, including fellow prospective jurors. Do not do any research, such as searching on the internet, and do not make any investigation to try to learn about this case on your own. If you are selected as a juror, your verdicts must be based solely on the evidence presented to you at trial.**

**Thank you for your cooperation.**

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

1. Is English your primary language?  YES  NO If NO, what is your first language and where were you born?  
\_\_\_\_\_  
\_\_\_\_\_
2. Are you able to: Read English?  YES  NO Write in English?  YES  NO
3. In what city or town do you live? \_\_\_\_\_. How long have you lived in this city or town? \_\_\_\_\_
4. How long have you lived in Nevada? \_\_\_\_\_
5. In what other places outside of Nevada (if any) have you lived during the past ten (10) years?  
\_\_\_\_\_
6. How old are you? \_\_\_\_\_ Are you:  Male  Female
7. Please check (✓) the one box that best describes your ethnicity:  African American/Black  Asian  
 Caucasian/White  Hispanic  Native American  Other: \_\_\_\_\_
8. Regarding your employment, are you currently [check (✓) all that apply]:  Employed full time  
 Employed part time  Employed more than one job  Self-employed  Unemployed  
 Homemaker  Retired  Disabled  Student  Student & Employed full or part time  
Other: \_\_\_\_\_
9. Please answer the questions below for your current job. If, for any reason, you are currently not working, please answer the questions below for the last job you held.
  - a. Name and location of your employer: \_\_\_\_\_
  - b. What is your job title? \_\_\_\_\_
  - c. For how long have/did you worked at this job? \_\_\_\_\_
  - d. Describe your job duties: \_\_\_\_\_  
\_\_\_\_\_
10. What other types of jobs have you held in the past? \_\_\_\_\_
11. Do you now, or have you ever, held a supervisory position?  YES  NO If YES, describe the type of work, when and the number of people supervised: \_\_\_\_\_
12. Regarding your education, check all the boxes below that apply to you. List all college degrees [including Associate degrees and certificates received]:  Less than High School  GED  High School  
 Trade School \_\_\_\_\_  Some College  Associates Degree \_\_\_\_\_  
 College Degree \_\_\_\_\_  Advanced Degree \_\_\_\_\_  
 Other degrees and/or Certificates: \_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

13. What is your current relationship status? Are you (check only one box):

Single and...	Married and...	Widow(ed) and...
<input type="checkbox"/> Never married	<input type="checkbox"/> Never divorced	<input type="checkbox"/> Remarried ( _____ times)
<input type="checkbox"/> Living with someone	<input type="checkbox"/> Previously divorced ( _____ times)	<input type="checkbox"/> Now single
<input type="checkbox"/> Divorced ( _____ times)	<input type="checkbox"/> Currently separated	<input type="checkbox"/> Living with someone

14. What is the occupation of your spouse/partner and where does this person work?

15. What is this person's highest level of education and specific certification(s) or degree(s) received?

16. Please list the age(s), gender(s), level in school /occupation, and whether your children live with you:

AGE	GENDER	LEVEL IN SCHOOL OR OCCUPATION	LIVES WITH YOU?
			<input type="checkbox"/> YES <input type="checkbox"/> NO
			<input type="checkbox"/> YES <input type="checkbox"/> NO
			<input type="checkbox"/> YES <input type="checkbox"/> NO
			<input type="checkbox"/> YES <input type="checkbox"/> NO
			<input type="checkbox"/> YES <input type="checkbox"/> NO

17. Have you ever been in any branch of the armed forces of the United States (including the military reserves, National Guard or ROTC)?  YES  NO If YES, please list the branch of service, approximate years of service, highest rank achieved, and where you are/were stationed: \_\_\_\_\_18. Have you ever served as a juror?  YES  NO If YES:a. In what court(s) were you a juror?  State Court  Federal Court  Other: \_\_\_\_\_

b. How many times have you served as a juror in a:

 Civil case \_\_\_\_\_ Times  Criminal case \_\_\_\_\_ Times  Grand Jury \_\_\_\_\_ Timesd. Where you ever the foreperson/presiding juror?  YES  NO

19. Check any of the following in which you have training, experience or education:

 Abuse (drugs, alcohol, physical, sexual, treatment programs, etc.) Ethnic studies (professor, teacher, student, agency, etc.) Law (attorney, clerk, judge, paralegal, etc.) Law enforcement (prison, jail, detention center, probation, security, police officer, investigator, etc.) Medical (doctor, nurse, paramedic, hospital, etc.) Mental health (psychologist, counselor, social work, social service agency, etc.)

If you checked any box(es), please explain: \_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

20. Do you have any special knowledge, education or experience in any of the following (check all that apply):

 Deoxyribonucleic Acid (DNA)    Firearms    Fingerprinting    Forensics    IdentificationIf you checked any box(es), please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_21. Do you own/keep firearms in your home?  YES    NO   Why or why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_22. The government has charged the defendants in this case with violating federal firearms statutes. Do you have any feelings about the laws prohibiting the use of firearms during violent crimes that would affect your ability to be an impartial juror in this case? Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_23. Have any of you ever witnessed a violent crime?  YES    NO   If YES, briefly explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_24. Have you or anyone close to you ever experienced any violent crime(s)?  YES    NO   If YES, briefly explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_25. If so, was there any arrest(s) or prosecution?  YES    NO   If YES, what were your (or other person's) feelings about the outcome of this situation? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_26. Other than a traffic ticket, have you or anyone close to you ever been accused, investigated, arrested, tried, convicted, or exonerated of a crime?  YES    NO   If YES, who and briefly explain the situation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_27. Do you have any feelings toward any racial or ethnic group which would cause you to judge a member of the group differently than you would judge a member of your own racial or ethnic group? Yes \_\_\_\_ No \_\_\_\_\_. If Yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

28. How would you feel about an acquaintance, friend, or family member being involved in an interracial relationship? I approve \_\_\_\_\_ It makes me uncomfortable \_\_\_\_\_ I accept it \_\_\_\_\_ I disapprove \_\_\_\_\_

29. Do you have any neighbors who are of a different race than your own? Yes \_\_\_\_\_ No \_\_\_\_\_ If Yes, how do you feel about having neighbors of a different race? If No, how would you feel about having neighbors of a different race? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

30. Do you know or have you ever met anyone who belonged to a group or organization that is/was referred to by law enforcement or society as a "gang"?  YES  NO If YES, briefly explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

31. Have any you, or to your knowledge, any member of your family had an especially positive or negative experience with any group or organization that is/was referred to by law enforcement or society as a "gang"?  YES  NO If YES, briefly explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

32. What does the term, "skinhead", mean to you? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

33. Have you ever met or known anyone who was a member of a "skinhead" organization?  YES  NO If YES, whom do you know and what are your feelings and opinions about the person/organization: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

34. Have you ever heard of or read about a group called the "Hammerskins"?  YES  NO If YES, would you say that your feelings or opinions about the "Hammerskins" group or individuals who identify themselves as a "Hammerskins" member:  Positive  Negative  Neutral  Never heard of? Briefly explain what you know about this group and why you feel the way you do: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

35. Have you ever heard of or read about a group called the "Skinheads Against Racial Prejudice" or "SHARPS"?  YES  NO. If YES, would you say that your feelings or opinions about "SHARPS" are:  Positive  Negative  Neutral  Never heard of? Briefly explain what you know about this group and why you feel the way you do: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

36. Have you heard of or read about an ideology called Christian Identity or Christian Identity skinheads?  YES  NO. If YES, would you say that your feelings or opinions about Christian Identity or Christian Identity skinheads are:  Positive  Negative  Neutral  Never heard of? Briefly explain what you know about Christian Identity or Christian Identity skinheads and why you feel the way you do: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

37. What does the term or phrase, "meth-head", mean to you? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

38. Have you ever met or known anyone who was a methamphetamine user or dealer or enforcer or cook?  YES  NO. If YES, what are your feelings, experiences and opinions with that person or persons: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

39. Do you believe that a person who has entered into a plea agreement with the government and who has agreed to testify should not be believed simply because he or she has entered into a plea agreement with the government? Yes \_\_\_\_ No \_\_\_\_ Not Sure \_\_\_\_\_. If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

40. Have you, or has a close friend or relative, ever had a negative or positive experience with the Las Vegas Metropolitan Police Department, the Federal Bureau of Investigation or with another law enforcement agency? Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain: \_\_\_\_\_

---

---

---

41. You may hear testimony from federal Bureau of Land Management personnel. Do you have any negative feelings about the Bureau of Land Management or opinions about its ownership of land that would impact your ability to be a fair and impartial juror in this case? Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain: \_\_\_\_\_

---

---

---

42. You may hear testimony in this case from law enforcement officers and government employees-- specifically, officers and detectives with the Las Vegas Metropolitan Police Department, which is commonly referred to as the LVMPD or "Metro") or agents with the Federal Bureau of Investigation, which is commonly referred to as the FBI. Do you have any beliefs about, experience with, or opinion regarding these law enforcement agencies, or law enforcement officials in general, that would make it in any way difficult for you to be a fair and impartial juror in this case? Yes \_\_\_\_ No \_\_\_\_ If Yes, please explain: \_\_\_\_\_

---

---

---

43. In this case, defendants Ross Hack and Leland Jones are accused of charges pertaining to the 1998 murders of Lin Newborn and Daniel Shersty. What, if anything, do you remember reading, hearing, seeing, or discussing about Ross Hack and/or Leland Jones and the deaths of Lin Newborn and Daniel Shersty? \_\_\_\_\_

---

---

---

44. Approximately how many times do you remember reading, hearing, seeing, or discussing anything about Ross Hack and/or Leland Jones and the deaths of Lin Newborn and Daniel Shersty?

None    1-5    5-10    More than 10

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

45. Based upon what you remember reading, hearing, seeing, or discussing about Ross Hack and/or Leland Jones and the deaths of Lin Newborn and Daniel Shersty, what opinion(s), if any, have you formed as to the innocence or guilt of:

(a) Ross Hack ?  Definitely guilty  Guilty  Not guilty  Definitely not guilty  Don't know/not sure;

(b) Leland Jones?  Definitely guilty  Guilty  Not Guilty  Definitely not guilty  Don't know/not sure

Please explain \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

46. What, if anything, do you remember reading, hearing, seeing or discussing about John Butler (sometimes referred to as "Jackie" or "Polar Bear") and the 1998 murders of Lin Newborn and Daniel Shersty? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

47. Approximately how many times do you remember reading, hearing, seeing, or discussing anything about John Butler ("Jackie" or "Polar Bear") and the 1998 murders of Lin Newborn and Daniel Shersty?

None  1-5  5-10  more than 10

48. Based upon what you remember reading, hearing, seeing, or discussing about John Butler (referred to sometimes as "Jackie" or "Polar Bear") and the 1998 murders of Lin Newborn and Daniel Shersty, what feelings do you have or opinions have you formed about what you have read, heard, seen or discussed?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

49. Have you ever known anyone who was murdered?  YES  NO If YES, please tell us about that situation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

50. Have you ever seen or read/heard anything about the movie "American History X"?  YES  NO If YES, What are your feelings about this movie? \_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

51. Do you watch CSI, Forensic Files, Cold Case Files, or any other crime/forensic/police/legal shows on t.v.?

 YES  NO If YES, which ones? \_\_\_\_\_\_\_\_\_\_  
\_\_\_\_\_

52. If you listen to talk radio, what programs do you regularly listen to? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

53. Name three public figures (alive or dead) you most admire most and please tell us why.

(1) \_\_\_\_\_

(2) \_\_\_\_\_

(3) \_\_\_\_\_

54. Name three public figures (alive or dead) you least admire least and please tell us why.

(1) \_\_\_\_\_

(2) \_\_\_\_\_

(3) \_\_\_\_\_

55. Do you have any specific health problems or take any medications that might make it difficult for you to sit as a juror and listen attentively to this case? Yes\_\_ No\_\_ If Yes, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

56. Do you hold any religious, moral, or ethical beliefs that would interfere with your ability to serve as a fair juror in this case? If so, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

57. Do you use any of the following social media sites or apps? Please check (✓) those you use regularly [at least 2-3 times/week]:  Facebook  Twitter  Instagram  Linkedin  Pinterest  Tumblr  Google Plus+  Flickr  MySpace  Tagged  Ask.fm  Classmates  Other: \_\_\_\_\_\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

58. What is the best book you have ever read? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

59. What are your 3 favorite television shows? (1) \_\_\_\_\_

(2) \_\_\_\_\_ (3) \_\_\_\_\_

**CONFIDENTIAL JUROR QUESTIONNAIRE****PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

60. In group situations where you do not know the other people very well, are you usually [check (✓) only one]:  A leader  A follower  A team player

61. To which unions or civic, social, political, professional, or religious organizations do/have you belonged?

---

---

---

62. As a general rule, which of the following best describes you?

Very conservative  Conservative  Moderate  Liberal  Very liberal  Other: \_\_\_\_\_

---

63. This trial is expected to last up to 4 weeks. Understanding that jury service is a hardship on virtually everyone, is there anything in your life that would prevent you from serving as a juror for 4 weeks?  YES  
 NO

If YES, briefly explain: \_\_\_\_\_

---

---

64. Is there anything about which you would like to speak privately with the judge and attorneys in this case?  
 YES  NO If YES, briefly explain: \_\_\_\_\_

---

---

---

# **CONFIDENTIAL JUROR QUESTIONNAIRE**

**PRINT Your Full Name:** \_\_\_\_\_ **Juror #:** \_\_\_\_\_

**PLEASE USE THE FOLLOWING SPACE TO COMPLETE YOUR ANSWER(S) TO ANY QUESTIONS IN THIS QUESTIONNAIRE. REMEMBER TO INDICATE THE # OF THE QUESTION YOU ARE ANSWERING:**